

ORAL ARGUMENT NOT YET SCHEDULED

No. 15-5170

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

SAFARI CLUB INTERNATIONAL, *et al.*,
Plaintiffs-Appellants

v.

SALLY JEWELL, in her official capacity as
United States Secretary of the Interior, *et al.*,
Defendants-Appellees

On Appeal from the United States District Court for the District of Columbia
(No. 14-00670)

**UNOPPOSED MOTION FOR REVISIONS
TO THE BRIEFING SCHEDULE**

Plaintiffs-Appellants, Safari Club International and National Rifle
Association of America (SCI/NRA), respectfully move this Court for revisions to
the current briefing schedule to add 14 days to the deadline for the opening brief
and make corresponding and additional revisions to the rest of the briefing

schedule. Federal Defendants-Appellees do not oppose this motion.¹ The mediator assigned to the case supports this request.

Plaintiffs-Appellants SCI/NRA have previously sought and were granted an extension of time in which to file their opening brief to accommodate the mediation. Dkt. 1582097 (November 5, 2015).

The reasons for this motion, as set forth more fully in the attached declaration, are the following:

- The parties just recently completed a six-week mediation, which was ultimately unsuccessful. During the time they were participating in the mediation, SCI/NRA focused more on developing and presenting a potential settlement strategy than on preparing for the briefing of this appeal. Under the current schedule, SCI/NRA's opening brief is

¹ Although Friends of Animals and Zimbabwe Conservation Task Force have been identified by the clerk on the docket of this appeal as "Intervenor for Defendant-Appellee," that entry is incorrect. These two organizations only intervened in the District Court in the portion of the case that is continuing in the court below. Friends of Animals and the Zimbabwe Conservation Task Force did not intervene in the court below until after the District Court issued the ruling that is the subject of this appeal. For that reason, neither Friends of Animals nor the Zimbabwe Conservation Task Force are parties to this appeal and for that reason, their counsel was not consulted for the filing of this motion.

due January 15, 2016 (which is 18 work days from the date that this motion is being filed).

- With the upcoming holidays, many of the attorneys for SCI/NRA will not be working on actual holidays and will be traveling and taking time off around the holidays.
- Attorneys for SCI must devote significant amounts of their time in the next month preparing for SCI's upcoming Convention, including the development and organization of a four-hour Continuing Legal Education course held at that Convention. The SCI Convention runs from February 2-6 and involves multiple meetings and seminars, the preparation for which must commence in early January.
- The attorneys for SCI/NRA have other litigation commitments and related travel, including other briefs in federal appeals and a joint status/discovery report in a federal lawsuit in California.
- A lead attorney for SCI on this appeal will be on an already-planned vacation from March 4-11, 2016, and most or all attorneys for SCI will be attending one of two professional conferences from March 16-18 (affecting the timing of the reply brief).

For these reasons, SCI/NRA need and request an additional 14 days to file their opening brief and an additional 7 days to prepare their reply brief.² SCI/NRA request the following new briefing schedule:

Opening Brief for SCI/NRA (additional 14 days)	1/29/16
Brief for Federal Defendants-Appellees (additional 3 days)	3/4/16
Reply Brief for SCI/NRA (additional 7 days)	3/25/16
Deferred Appendix	4/01/16
Final Briefs	4/15/16

This schedule is based on the requested additional days and the timing between briefs set forth in the briefing schedule established by this Court in its Order dated October 6, 2015.

WHEREFORE, Plaintiffs-Appellants SCI/NRA respectfully move this Court to grant the requested unopposed motion to adopt the proposed new briefing schedule.

² The parties have added three days to the time period for Federal Defendants-Appellees' Opposition brief primarily to balance out the additional time afforded SCI/NRA attorneys for the filing of their Reply Brief.

Dated: December 17, 2015

Respectfully submitted,

/s/ Douglas S. Burdin

Anna M. Seidman
Douglas S. Burdin
Jeremy E. Clare
Safari Club International
501 2nd Street NE
Washington, D.C. 20002
202-543-8733
aseidman@safaricloud.org
dburdin@safaricloud.org
jclare@safaricloud.org

Counsel for Plaintiff-Appellant
Safari Club International

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 17th day of December, 2015, a true and correct copy of the Unopposed Motion for Revisions to the Briefing Schedule by Plaintiffs-Appellants was electronically filed through the CM/ECF system, which caused all parties to be served by electronic means, as more fully reflected in the Notice of Electronic Filing.

/s/ Douglas S. Burdin
Douglas S. Burdin

Counsel for Plaintiff-Appellant
Safari Club International